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6 BEENVERIFIED, LLC

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12 Attorneys for Plaintiff and  
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13 [See signature block for additional counsel]

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

19 DAVID ESCOBAR, on behalf of himself  
and all others similarly situated,

21 Plaintiff,

22 v.

23 BEENVERIFIED, INC., and  
BEENVERIFIED, LLC,

24 Defendants.

Case No. 3:21-cv-09433-MMC

**STIPULATION TO (1) EXTEND TIME TO  
RESPOND TO INITIAL COMPLAINT,  
AND (2) RESCHEDULE CASE  
MANAGEMENT CONFERENCE;  
DECLARATION OF DAVID W. SKAAR  
[L.R. 6-1(b) and 6-2]**

Honorable Maxine M. Chesney

1 Pursuant to Local Rules 6-1(b) and 6-2, Plaintiff David Escobar and Defendants  
2 BeenVerified, Inc. and BeenVerified, LLC (“Defendants”) (together, the “Parties”) hereby  
3 stipulate as follows:

4 WHEREAS, by stipulation dated January 26, 2022, pursuant to Local Rule 6-1(a), the  
5 Parties filed a Stipulation to Extend Time to Respond to the Initial Complaint, from January 27,  
6 2022 to February 28, 2022;

7 WHEREAS, the Case Management Conference Order, at docket number 12, set an initial  
8 Case Management Conference for March 11, 2022, at 10:30 a.m.;

9 WHEREAS, the Defendants have been investigating the Plaintiff’s substantive  
10 allegations, and counsel for the Parties have been conferring regarding the merits of the  
11 Complaint;

12 WHEREAS, counsel for the Parties have been discussing a potential early resolution of  
13 the Plaintiff’s claims; and

14 WHEREAS, the Parties agree that additional time is needed to allow the Parties to fully  
15 explore a potential early resolution, before the Parties incur fees and expenses related to one or  
16 more motions to dismiss or amended pleadings.

17 NOW, THEREFORE, it is hereby stipulated and agreed by and between the Parties,  
18 subject to the Court’s approval, that the current schedule be modified as follows:

19 1. That the deadline for Defendants to respond to the initial Complaint will be  
20 extended from February 28, 2022 to March 28, 2022; and

21 2. That the Case Management Conference will be continued from March 11, 2022 to  
22 April 15, 2022, at 10:30 a.m., and all related deadlines will be continued accordingly.

23 IT IS SO STIPULATED.

24 Dated: February 25, 2022

TURKE & STRAUSS LLP

25 By: /s/ Raina Borrelli  
26 Sam Strauss  
27 Raina Borrelli

28 Michael F. Ram (SBN 104805)  
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Attorneys for Plaintiff David Escobar and  
the Proposed Class

Dated: February 25, 2022

HOGAN LOVELLS US LLP

By: /s/ David W. Skaar

David W. Skaar  
Attorneys for Defendants  
BEENVERIFIED, INC. and  
BEENVERIFIED, LLC

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## Attestation

Pursuant to Local rule 5-1(h)(3), I attest that each of the other signatories listed above has concurred in the filing of this document.

/S/ David W. Skaar

David W. Skaar

## **DECLARATION**

I, David W. Skaar, declare as follows:

1. I am a member in good standing of the State Bar of California, a counsel in the law firm Hogan Lovells US LLP, and one of the attorneys representing Defendants BeenVerified, Inc. and BeenVerified, LLC in this action. I have personal knowledge of the fact stated in this declaration and would, if called as a witness, competently testify to those facts.

2. By stipulation dated January 26, 2022, pursuant to Local Rule 6-1(a), the Parties filed a Stipulation to Extend Time to Respond to the Initial Complaint, from January 27, 2022 to February 28, 2022. This was the Parties' first request for an extension of time in this matter.

3. The Defendants have been investigating the Plaintiff's substantive allegations, and counsel for the Parties have been conferring regarding the merits of the Complaint. Counsel for the Parties also have been discussing a potential early resolution of the Plaintiff's claims, and we have agreed that additional time is needed to allow the Parties to fully explore a potential early resolution, before the Parties incur fees and expenses related to one or more motions to dismiss or amended pleadings.

4. The requested extension of time to respond to the Complaint does not directly impact any other deadlines previously set by the Court. However, the Parties agree that it will be more efficient and productive for the Case Management Conference to occur after the Defendants file their response to the Complaint.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 25, 2022, in Mammoth Lakes, California.

  
David W. Skaar

## **ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED THAT:

1. The deadline for Defendants to respond to the initial Complaint will be extended from February 28, 2022 to March 28, 2022; and

2. The Case Management Conference will be continued from March 11, 2022 to April 15, 2022, at 10:30 a.m., and all related deadlines will be continued accordingly.

Dated: \_\_\_\_\_, 2022

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Honorable Maxine M. Chesney  
U.S. District Court Judge

## **PROOF OF SERVICE**

I, Jamie Wood, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 1999 Avenue of the Stars, Suite 1400, Los Angeles, California 90067. On February 25, 2022, I served a copy of the within document(s):

**STIPULATION TO (1) EXTEND TIME TO RESPOND TO INITIAL  
COMPLAINT, AND (2) RESCHEDULE CASE MANAGEMENT  
CONFERENCE; DECLARATION OF DAVID W. SKAAR [L.R. 6-1(b) and  
6-2]**

by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

Benjamin R. Osborn (to be admitted *Pro Hac Vice*)  
102 Bergen St.  
Brooklyn, NY 11201  
Telephone: (347) 645-0464  
Email: ben@benosbornlaw.com

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 25, 2022, at Santa Clarita, California.

Jamie Wood  
Jamie Wood